



Sullivan & Worcester LLP  
1633 Broadway  
New York, NY 10019

T 212 660 3000  
F 212 660 3001  
[www.sandw.com](http://www.sandw.com)

January 27, 2016

**VIA ECF**

Honorable Laura Taylor Swain  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: **LP Funding, LLC v. Tantech Holdings, Ltd., No. 15 Civ. 4081 (LTS) (KNF)**

Dear Judge Swain:

We are counsel to defendant Tantech Holdings, Ltd. and write on behalf of the parties to request the Court's permission to reschedule the Court-ordered mediation in this case from February 12, 2016 until March 4, 2016.

In the Court's October 30, 2015 Pre-Trial Scheduling Order, the Court directed the parties to begin meeting with the mediator by February 19, 2016. The parties have been in contact with the Mediator by email and had a lengthy conference call with the Mediator on November 20, 2015 to discuss scheduling, required submissions and other details related to the mediation. The parties continue to believe that mediation would be most productive after the first round of documents are exchanged and wish to conduct the mediation on March 4, 2016. The parties hope that the additional time will allow them to substantially complete their initial document productions and resolve any issues that may arise with those productions. The Mediator, party representatives and counsel are available for mediation on March 4, 2016.

For these reasons, we respectfully request that the Court allow the Court-ordered mediation to take place on March 4, 2016.

Respectfully submitted,

/s/Harry H. Rimm

Harry H. Rimm

cc: All Counsel of Record (Via ECF)  
Mediation Office (Via Email)